

# MEMO ENDORSED

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May 11, 2021

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: Littman Krooks, et al. v. N.Y.C. Dept. of Educ., 21-cv-2947(ER)(OTW)*

Dear Judge Ramos:

I am Senior Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work representing 28 parent/s at administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write, with Plaintiffs' consent, to respectfully request a six-month stay of this action, including Defendant's time to respond to the complaint. This is the first request for an extension. Defendant's response is currently due May 11, 2021. The requested extension would provide Defendant with sufficient time to obtain updated billing records, review those records together with the administrative records below, and attempt to resolve all 28 claims for fees presented here.

As Your Honor is aware, a federal action seeking solely fees and costs under the IDEA typically takes between 60 and 90 days to fully resolve. This action contains 28 such claims. Defendant submits that work by counsel for Defendant is better spent on efforts to globally resolve the 28 fees claims presented rather than responding to the factually dense 363-paragraph complaint. We are hopeful that the parties will fully resolve this matter without the need to further burden the Court.

Accordingly, Defendant respectfully requests that this action including Defendant's time to respond to the complaint be stayed until October 11, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

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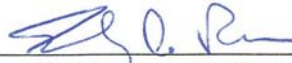
Martin Bowe

Senior Counsel

cc: Arshi Pal, Esq. (via ECF)

Defendant's deadline to answer or otherwise respond to the complaint is extended to October 11, 2021. The Clerk of Court is respectfully directed to terminate the motion. Doc. 6.

So ordered.



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Edgardo Ramos, U.S.D.J

Dated: 5/10/2021

New York, New York